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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORLTAND DIVISION

**UNIGESTION HOLDING, S.A., d/b/a
DIGICEL HAITI,**

Plaintiff and Counter-Claim Defendant

v.

**UPM TECHNOLOGY, INC. d/b/a UPM
TELECOM, INC., et al.**

Defendants and Counter-Claim Plaintiffs

Case No. 3:15-CV-00185-SI

**AMENDED JOINT STIPULATIONS
(GLOSSARY)**

Pursuant to the Trial Management Order (ECF #191), Unigestion Holdings, S.A., dba Digicel-Haiti ("Digicel-Haiti") and UPM Technology, Inc. and Bruce Tran (collectively, "UPM") stipulate that the attached terms may be considered to have the definitions stated for purposes of the trial in this case. The attached joint stipulated glossary substitutes and replaces any prior filed joint stipulated glossary.

Dated: November 13, 2022.

Respectfully submitted,

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GLOSSARY OF TERMS

SIM or SIM Card

“SIM” stands for “subscriber identity module”. A SIM card is a computer chip that contains a range of identifying information.

The operator of a wireless network has SIM cards manufactured that contain information specific to that network.

Every wireless phone has a SIM card. A valid SIM card is needed to allow the phone to make calls.

Call Detail Record or CDR

Telephone calls (wireless or landline) go through devices called switches that are owned and operated by telephone companies. Telephone company switches are typically configured to record and store, in electronic form, a range of information about every call that goes through the switch. This information includes:

- The date and time the call starts (measured to the second)
- The date and time the call ends (measured to the second)
- The telephone number of the device making the call (sometimes called “Calling Line Identification” or “CLI”)
- The telephone number of the device being called
- For wireless networks, the specific cell site handling the call
- Other information relating to the routing of the call

The data for a given call is referred to as a “Call Detail Record”, or “CDR”.

Gateway

In the context of this case, a “Gateway” refers to a device with multiple radio antennas that can communicate with a wireless network. Each of these antennas is called a “port” on the Gateway.

Ports or Channels

A “port” or a “channel” refers to a radio on a Gateway.

GSM or Global Standard for Mobility

Different wireless networks use different technical standards and protocols for the communications between the network and the wireless devices that send calls to, or receive calls from, the network. A very common standard for wireless networks around the world is the “GSM” or “Global Standard for Mobility.” Digicel-Haiti’s network in Haiti is a GSM system, as are major wireless networks in the United States.

IP

In this case, “IP” means “Internet Protocol.” It refers to the technical standards for formatting data communications so that they can travel over the Internet.

Roam Like You’re Home or RLYH

“Roam Like You’re Home” or “RLYH” refers to a specific service that Digicel Haiti offered to its subscribers roaming in the United States. With RLYH, a Digicel Haiti subscriber would pay Digicel-Haiti a flat fee and Digicel Haiti would then charge calls using the associated SIM card made from the United States back to another Digicel Haiti subscriber at the same rate that a subscriber would pay for a local wireless call in Haiti. (That is, the rate while roaming would be “like you’re home”.)

SIM Management Software

SIM Management Software is a computer program (software) that runs on a SIM Server (see below). It manages the inventory of SIMs in a SIM Box (also called a SIM Array or SIM Unit), and manages the assignment of SIMs to ports on Gateways and how those SIMs are used.

SIM Server

A “SIM Server” is a physical or virtual device that runs SIM Management Software (see above).

SIM Array // SIM Box // SIM Unit

The terms “SIM Unit,” “SIM Array,” or “SIM Box” all refer to the same device. The device is essentially a large SIM card reader that can hold many hundreds of SIM cards at the same time.

Softswitch

A “softswitch” is a computer program running on a server connected to the Internet that can receive calls in “Voice over Internet Protocol,” or “VoIP” format, and then transmit those calls by converting them to GSM and then transmitting them via the Internet to a UPM Gateway device in another location.

“Terminate” a call

In the telecommunications industry, a call is said to be “terminated” when it is delivered to the network serving the subscriber being called, and that subscriber accepts the call.

Tower

In this case, references to a “tower” refer to a cell site, that is, a location where there is an antenna used by a wireless network to send and receive calls from wireless devices. The antenna may literally be on a tower, but may also be, for example, on the roof of a building.

VoIP

“VoIP” means “Voice over Internet Protocol”. It refers to sending voice telephone calls from one place to another using the Internet rather than a traditional wired or wireless telephone network.

VPN / VPN Router

VPN means “virtual private network.” It refers to software that establishes a secure, encrypted connection between two or more points on the Internet and that to the extent possible maintains a stable connection between those points. A “VPN Router” is a device that switches or routes data communications traffic among different points on a VPN.

WiMAX

WiMAX is a wireless protocol that is designed to provide a wireless connection between a provider of Internet access service and a WiMAX wireless modem.

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2022, I served the foregoing **AMENDED JOINT STIPULATIONS (GLOSSARY)** on the following individuals by electronic service to said individuals:

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